

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
BODNER LAW PLLC Jonathan S. Bodner, Esq. 55 Cherry Lane, Suite 101 Carle Place, New York 11514 Tel: (516) 444-3923 jbodner@bodnerlawpllc.com <i>Attorney for MTI Digital Inc.</i>	
In Re:	
RITE AID CORPORATION, et al.,	Chapter 11
Debtor.	Case No: 23-18993 (MBK)

**LIMITED OBJECTION AND RESERVATION OF RIGHTS BY MTI DIGITAL INC.
TO CURE AMOUNT LISTED AT DOCKET NUMBER 2681**

MTI Digital Inc. (“MTI”), by counsel, files this limited objection and reservation of rights with respect to the cure amount for the proposed assumption of the March 9, 2022 Broadcast Service Agreement listed in the schedule of executory contracts to be assumed attached as exhibit A to the amended plan supplement filed at document number 2681.

1. The schedule reflects a blank cure amount with respect to the agreement.
2. MTI filed proof of claim number 4509 in the Rite Aid Hdqtrs Corp. case asserting a pre-petition claim in the amount of \$66,227.09.
3. MTI continues to provide services to the debtors under the agreement and certain post-petition invoices have not yet been paid.
4. MTI and the debtors, by counsel, have conferred regarding these matters and it is MTI’s understanding that the parties have reached an agreement regarding the pre-petition amounts and are continuing to discuss post-petition amounts to fix a cure amount.

5. MTI files this limited objection and reservation of rights prior to the April 23, 2024 objection deadline set forth in the notice filed at docket number 2733 out of an abundance of caution, and maintains that, in addition to pre-petition amounts, post-petition amounts which remain unpaid as of the date of assumption must be included in the cure amount or be paid pursuant to any other agreement to be reached between the parties.

Respectfully submitted,

Dated: April 22, 2024

BODNER LAW PLLC

By: 

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